

REMARKS

In the Office Action, the Examiner rejected claims 1-15 under 35 U.S.C. 102(b) as being unpatentable over Pedersen et al. (U.S. Patent No. 6,134,705). In this Amendment, Applicants have amended claims 1 and 6, have cancelled claim 12, and have added new claims 16-26. Accordingly, claims 1-11 and 13-26 will be pending after entry of this Amendment.

I. Amendment to the Specification and Drawings

In this Amendment, Applicants have corrected four typographical errors in the drawings and three typographical errors in the specification. No new matter had been added, as all the corrections are supported by the discussion in the specification and by the illustrations in the figures. Specifically, Applicants moved a "From 615" transitional arrow that previously pointed to operation 660 in the flowchart illustrated in Figure 6B to now point to the operation 655. This change is supported by (1) the referenced transition from 615 to 655 in Figure 6A, (2) the discussion in the specification on page 34, lines 5-7, and (3) the discussion in the specification on page 34, lines 8-22, which provides the rationale as to why the process 600 of Figure 6 transitions to 655 from 615 and 645.

Applicants also corrected the description of the operation 1445 in Figure 14. This correction is supported by the description in the specification on page 51, lines 15-17. In addition, Applicants added a "From 2242" transitional arrow to operation 2228 on Figure 22B. This correction is supported by the description in the specification on page 72, lines 14-15. Applicants also corrected the numbering of operation 2246 in Figure 22C. This correction is supported by the description in the specification on page 72, lines 19-20.

In the specification on page 31, Applicants changed an inaccurate reference to a transition from 615 to 660 in Figure 6B, to an accurate reference regarding a transition from 615 to 655. As mentioned above, this change is supported by (1) the referenced transition from 615 to 655 in

Figure 6A, (2) the discussion in the specification on page 34, lines 5-7, and (3) the discussion in the specification on page 34, lines 8-22, which provides the rationale as to why the process 600 of Figure 6 transitions to 655 from 615 and 645.

On page 72, line 13, Applicants have also changed "2242" to "2202." This is a reference number for the operation that the process 2200 of Figures 22A-22C performs to generate several graphs. As mentioned in the specification on page 65, line 1 to page 66, line 16, the process 2200 generates these graphs at 2202. *See also* page 70, lines 15-17. Finally, on page 73, lines 2-3, Applicants have changed "[a]fter 2244, the process ends," to "[a]fter 2246, the process ends." As shown in Figure 22C, the process 2200 ends after it completes the database tables; as specified in the specification, the process 2200 completes the database tables at 2246, which proceeds 2244 in Figure 22C. *See* page 72, lines 19-20.

II.Rejections under 35 U.S.C. 102(b)

In the Office Action, the Examiner rejected claims 1-15 under 35 U.S.C. 102(b) as being unpatentable over Pedersen et al. (U.S. Patent No. 6,134,705, hereinafter Pedersen). The Applicants respectfully traverse. Claim 1 recites a method of specifying encoded sub-networks comprising:

- a) defining a plurality of graphs, wherein each graph has a set of nodes;
- b) specifying different sets of local functions for each graph, wherein each set of local functions for each particular graph includes one local function for each node of the particular graph, and the combination of each graph with one of the set of local functions specified for the graph specifies a sub-network;
- c) storing the graph and the local functions;
- d) for each particular specified sub-network, storing an identifier that specifies the set of particular local functions and the particular graph that specify the particular sub-network.

Pedersen does not teach or suggest each recited feature of claim 1. For example, Pedersen does not teach or suggest specifying **different** sets of local functions for a graph where **each set**

of local functions includes one local **function for each node** of the graph, as recited in claim 1. Solely for the sake of argument, even if it is assumed that Pedersen discloses **one** set of functions for a graph, no where in Pedersen is it taught or suggested that **different** sets of functions for a graph are specified, as required in claim 1. It could be argued that a graph comprised of multiple nodes can be divided into different sets of nodes so that each set of nodes has an associated set of functions, and hence, different sets of functions for the graph are specified. This argument does not apply in this case, however, since claim 1 also requires that each set of functions for a graph includes a function for **each** node of the particular graph. As such, nodes of the graph can not be divided into separate sets and then associated with different sets of functions to meet the “different sets of functions” limitation of claim 1.

In addition, Pedersen does not teach or suggest storing an identifier that specifies a set of functions and a graph that specify a sub-network, as recited in claim 1. Pedersen discloses identifying particular nodes of a netlist. These nodes may be nodes directly modified by a user, external modified nodes, or affected nodes (col. 13, lines 28-38). Identifying particular nodes of a netlist based on certain criteria is entirely different, however, than storing an identifier that specifies a set of functions and a graph. First, these steps are relating to two different elements: the identifying step in Pedersen is relating to nodes where the storing step of claim 1 of the present application is relating to a set of functions and a graph. And second, identifying an element (whatever that element may be) based on certain criteria and storing an identifier for the element are two unrelated actions that require different processes and serve different purposes.

As such, Applicants submit that claim 1 is in allowable form. Claims 2-11 are dependent on claim 1 and are allowable for at least the same reasons as claim 1.

Independent claim 13 recites a method of specifying encoded sub-networks comprising:

- a) specifying a graph with a set of nodes;
- b) storing the graph;

- c) storing first and second sets of local functions, wherein each set includes a local function for each node of the graph, wherein the combination of the graph and the first set of local functions specifies a first sub-network, and the combination of the graph and the second set of local functions specifies a second sub-network;
- d) for the first sub-network, storing a first identifier that specifies the graph and the first set of local functions; and
- e) for the second sub-network, storing a second identifier that specifies the graph and the second set of local functions.

Pedersen does not teach or suggest each recited feature of claim 13. For example, Pedersen does not teach or suggest storing first and second sets of functions where each set includes a function for each node of a graph. Similar to the discussion above in relation to claim 1, even if it is assumed that Pedersen discloses **one** set of functions for a graph, nowhere in Pedersen is it taught or suggested that **two** sets of functions for a graph are stored, as required in claim 13. Also, Pedersen does not teach or suggest storing an identifier that specifies a set of functions and a graph for a sub-network, as recited in claim 13. The reasons for this are discussed above in relation to claim 1.

III. New Claims 16-26

In this Amendment, Applicants have added claims 16-26. New claims 16-26 are computer readable medium claims that are similar to claims 1-11. Accordingly, Applicants submit that these claims are patentable over the cited art for the same reasons as stated above for claims 1-11.

IV. Information Disclosure Statement

Accompanying this Amendment is the 1449 form of an Information Disclosure Statement that Applicants are submitting concurrently with but separately from this Amendment. This Information Disclosure Statement lists and provides copies of several additional references for the Examiner's consideration. The Examiner is requested to make these documents of record.

CONCLUSION

Based on the foregoing remarks, Applicants believe that the rejections and objections in the Office Action of September 23, 2003 are fully overcome and that the application is in condition for allowance. If the Examiner has any questions regarding the case, the Examiner is invited to contact Applicants' undersigned representative at the number given below.

Respectfully submitted,

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Dated: 1/23/04



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Amendments to the Drawings:

Attached are four sheets of drawings that include changes to Figures 6B, 14, 22B, and 22C. These sheets replace the original four sheets that included Figures 6B, 14, 22B, and 22C.

The Examiner is respectfully requested to approve the amended drawings.